March 14, 2001

Mr. Stephen Perrott
DaimlerChrysler Corporation
Indianapolis Foundry
1100 South Tibbs Avenue
Indianapolis, Indiana 46241-2797

Re: Significant Part 70 Source Modification
No.: 097-12464-00012

Dear Mr. Perrott:

On August 23, 2000 an Interim Significant Source Modification was issued for the construction of three (3) new shaker units identified as Emission Unit ID 44 with combined maximum capacity of 75 tons of castings per hour and controlled by an existing baghouse identified as Control Equipment ID CE-8, exhausting at 60,000 acfm at Stack/Vent ID S-8, and by an additional new baghouse identified as Control Equipment ID CE-7, exhausting at 120,000 acfm at Stack/Vent ID S-7.

Pursuant to the provisions of 326 IAC 2-7-12, a Significant Permit Modification to this permit is hereby approved as described in the attached Technical Support Document (TSD) and TSD Addendum.

The proposed Significant Source Modification approval will be incorporated into the pending Part 70 permit application pursuant to 326 IAC 2-7-10.5(l)(3). If there are no changes to the proposed construction of the emission units, the source may begin operating on the date that ERMD receives an affidavit of construction pursuant to 326 IAC 2-7-10.5(h). If there are any changes to the proposed construction the source can not operate until an Operation Permit Validation Letter is issued.

This decision is subject to the Indiana Administrative Orders and Procedures Act - IC 4-21.5-3-5. If you have any questions on this matter, please contact Mr. Boris Gorlin at (317) 327-2234. Thank you for your time and cooperation in this matter.

Sincerely,

Original Signed by Daniel B. Dovenbarger
Daniel B. Dovenbarger
Administrator
ERMD

enclosures

PART 70 SIGNIFICANT SOURCE MODIFICATION OFFICE OF AIR QUALITY AND INDIANAPOLIS ENVIRONMENTAL RESOURCES MANAGEMENT DIVISION

Daimler Chrysler Indianapolis Foundry

1100 South Tibbs Avenue
Indianapolis, IN 46241

(herein known as the Permittee) is hereby authorized to construct and operate subject to the conditions contained herein, the emission units described in Section A (Source Summary) of this approval.

This approval is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-7 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

Source Modification No.: 097-12464-00012	
Issued by: Original Signed by Daniel B. Dovenbarger Daniel B. Dovenbarger Administrator ERMD	Issuance Date: March 14, 2001

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Certification
Quarterly Report
Quarterly Deviation and Compliance Monitoring Report
Affidavit of Construction

SECTION A SOURCE SUMMARY

This approval is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ) and Indianapolis Environmental Resources Management Division (ERMD). The information describing the emission units contained in conditions A.1 through A.2 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this approval pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

A.1 General Information [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)] [326 IAC 2-7-1(22)]

The Permittee owns and operates stationary grey iron foundry.

Responsible Official:	Robert L. Bowers, Plant Manager
Source Address:	1100 South Tibbs Avenue, Indianapolis, IN 46241
Mailing Address:	1100 South Tibbs Avenue, Indianapolis, IN 46241
Phone Number:	(317) 240-4957
SIC Code:	3321
County Location:	Marion
County Status:	Attainment for all criteria pollutants
Source Status:	Part 70 Permit Program. PSD major source

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)] [326 IAC 2-7-5(15)]

This stationary source is approved to construct and operate the following emission units and pollution control devices:

(a) three (3) new shaker units identified as Emission Unit ID 44 with combined maximum capacity of 75 tons of castings per hour and controlled by an existing baghouse identified as Control Equipment ID CE-8 and exhausting at 60,000 acfm at Stack/Vent ID S-8. Emissions also to be controlled by an additional new baghouse identified as Control Equipment ID CE-7 and exhausting at 120,000 acfm at Stack/Vent ID S-7.

A.3 Part 70 Permit Applicability [326 IAC 2-7-2]

This stationary source is required to have a Part 70 permit by 326 IAC 2-7-2 (Applicability) because:

(a) It is a major source, as defined in 326 IAC 2-7-1(22);

(b) It is a source in a source category designated by the United States Environmental Protection Agency (U.S. EPA) under 40 CFR 70.3 (Part 70 - Applicability).

SECTION B GENERAL CONSTRUCTION CONDITIONS

B.1 Definitions [326 IAC 2-7-1]

Terms in this approval shall have the definition assigned to such terms in the referenced regulation. In the absence of definitions in the referenced regulation, any applicable definitions found in IC 13-11, 326 IAC 1-2 and 326 IAC 2-7 shall prevail.

B.2 Effective Date of the Permit [IC13-15-5-3]

Pursuant to IC 13-15-5-3, this approval becomes effective upon its issuance.

B.3 Revocation of Permits [326 IAC 2-1.1-9(5)][326 IAC 2-7-10.5(i)]

Pursuant to 326 IAC 2-1.1-9(5)(Revocation of Permits), the Commissioner and ERMD Administrator may revoke this approval if construction is not commenced within eighteen (18) months after receipt of this approval or if construction is suspended for a continuous period of one (1) year or more.

B.4 Significant Source Modification [326 IAC 2-7-10.5(h)]

This document shall also become the approval to operate pursuant to 326 IAC 2-7-10.5(h) when, prior to start of operation, the following requirements are met:

(a) The attached affidavit of construction shall be submitted to the ERMD, verifying that the emission units were constructed as proposed in the application. The emissions units covered in the Significant Source Modification approval may begin operating on the date the affidavit of construction is postmarked or hand delivered to ERMD if constructed as proposed.

(b) If actual construction of the emissions units differs from the construction proposed in the application, the source may not begin operation until the source modification has been revised pursuant to 326 IAC 2-7-11 or 326 IAC 2-7-12 and an Operation Permit Validation Letter is issued.

(c) If construction is completed in phases; i.e., the entire construction is not done continuously, a separate affidavit must be submitted for each phase of construction. Any permit conditions associated with operation start up dates such as stack testing for New Source Performance Standards (NSPS) shall be applicable to each individual phase.

(d) The Permittee shall receive an Operation Permit Validation Letter from the ERMD Administrator and attach it to this document.

However, in the event that the Title V application is being processed at the same time as this application, the following additional procedures shall be followed for obtaining the right to operate:

(1) If the Title V draft permit has not gone on public notice, then the change/addition covered by the Significant Source Modification will be included in the Title V draft.

(2) If the Title V permit has gone through final EPA proposal and would be issued ahead of the Significant Source Modification, the Significant Source Modification will go through a concurrent 45 day EPA review. Then the Significant Source Modification will be incorporated into the final Title V permit at the time of issuance.

(3) If the Title V permit has not gone through final EPA review and would be issued after the Significant Source Modification is issued, then the Modification would be added to the proposed Title V permit, and the Title V permit will be issued after EPA review.

B.5 Phase Construction Time Frame

That pursuant to 326 IAC 2-1.1-9(5)(Revocation of Permits), the IDEM (OAQ) and ERMD may revoke this approval to construct if the:

(a) Construction of the three (3) new shaker units identified as Emission Unit ID 44 has not begun within eighteen (18) months from the effective date of this approval or if during the construction work is suspended for a continuous period of one (1) year or more.

The OAQ and ERMD may extend such time upon satisfactory showing that an extension, formally requested by the Permittee is justified.

B.6 Duty to Supplement and Provide Information [326 IAC 2-7-4(b)] [326 IAC 2-7-5(6)(E)] [326 IAC 2-7-6(6)]

(a) The Permittee, upon becoming aware that any relevant facts were omitted or incorrect information was submitted in the permit application, shall promptly submit such supplementary facts or corrected information to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

and

ERMD
2700 South Belmont Avenue
Indianapolis, IN 46221

The submittal by the Permittee does require the certification by the “responsible official” as defined by 326 IAC 2-7-1(34).

(b) The Permittee shall furnish to IDEM, OAQ, and ERMD within a reasonable time, any information that IDEM, OAQ, and ERMD may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. The submittal by the Permittee does require the certification by the “responsible official” as defined by 326 IAC 2-7-1(34). Upon request, the Permittee shall also furnish to IDEM, OAQ, and ERMD copies of records required to be kept by this permit or, for information claimed to be confidential, the Permittee may furnish such records directly to the U. S. EPA along with a claim of confidentiality. [326 IAC 2-7-5(6)(E)]

(c) The Permittee may include a claim of confidentiality in accordance with 326 IAC 17. -When furnishing copies of requested records directly to U. S. EPA, the Permittee may assert a claim of confidentiality in accordance with 40 CFR 2, Subpart B.

SECTION C GENERAL OPERATION CONDITIONS

C.1 Certification [326 IAC 2-7-4(f)][326 IAC 2-7-6(1)][326 IAC 2-7-5(3)(C)]

(a) Where specifically designated by this approval or required by an applicable requirement, any application form, report, or compliance certification submitted under this approval shall contain certification by a responsible official of truth, accuracy, and completeness. This certification, shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

(b) One (1) certification shall be included, on the attached Certification Form, with each submittal.

(c) A responsible official is defined at 326 IAC 2-7-1(34).

C.2 Preventive Maintenance Plan [326 IAC 2-7-5(1),(3) and (13)] [326 IAC 2-7-6(1) and (6)] [326 IAC 1-6-3]

(a) If required by specific condition(s) in Section D of this approval, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMP) within ninety (90) days after issuance of this approval, including the following information on each facility:

(1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;

(2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions;

(3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

If due to circumstances beyond its control, the PMP cannot be prepared and maintained within the above time frame, the Permittee may extend the date an additional ninety (90) days provided the Permittee notifies:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

and

ERMD
2700 South Belmont Avenue
Indianapolis, IN 46221

(b) The Permittee shall implement the Preventive Maintenance Plans as necessary to ensure that failure to implement the Preventive Maintenance Plan does not cause or contribute to a violation of any limitation on emissions or potential to emit.

(c) PMP's shall be submitted to IDEM, OAQ, and ERMD upon request and shall be subject to review and approval by IDEM, OAQ, and ERMD. IDEM, OAQ, and ERMD may require the Permittee to revise its Preventive Maintenance Plan whenever lack of proper maintenance causes or contributes to any violation.

C.3 Permit Amendment or Modification [326 IAC 2-7-11] [326 IAC 2-7-12]

(a) The Permittee must comply with the requirements of 326 IAC 2-7-11 or 326 IAC 2-7-12 whenever the Permittee seeks to amend or modify this approval.

(b) Any application requesting an amendment or modification of this approval shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

and

ERMD
2700 South Belmont Avenue
Indianapolis, IN 46221.

Any such application should be certified by the "responsible official" as defined by 326 IAC 2-7-1(34) only if a certification is required by the terms of the applicable rule

(c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]

C.4 Opacity [326 IAC 5-1]

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Exemptions), visible emissions shall meet the following, unless otherwise stated in this approval:

(a) Opacity shall not exceed an average of thirty percent (30%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.

(b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings) as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor in a six (6) hour period.

C.5 Operation of Equipment [326 IAC 2-7-6(6)]

Except as otherwise provided in this approval, all air pollution control equipment listed in this approval and used to comply with an applicable requirement shall be operated at all times that the emission unit vented to the control equipment is in operation.

C.6 Stack Height [326 IAC 1-7]

The Permittee shall comply with the applicable provisions of 326 IAC 1-7 (Stack Height Provisions), for all exhaust stacks through which a potential (before controls) of twenty-five (25) tons per year or more of particulate matter or sulfur dioxide is emitted.

Testing Requirements [326 IAC 2-7-6(1)]

C.7 Performance Testing [326 IAC 3-6][326 IAC 2-1.1-11]

(a) Compliance testing on new emission units shall be conducted within 60 days after achieving maximum production rate, but no later than 180 days after initial start-up, if specified in

Section D of this approval. All testing shall be performed according to the provisions of 326 IAC 3-6 (Source Sampling Procedures), except as provided elsewhere in this approval, utilizing any applicable procedures and analysis methods specified in 40 CFR 51, 40 CFR 60, 40 CFR 61, 40 CFR 63, 40 CFR 75, or other procedures approved by IDEM, OAQ.

A test protocol, except as provided elsewhere in this approval, shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

and

ERMD
2700 South Belmont Avenue
Indianapolis, IN 46221.

no later than thirty-five (35) days prior to the intended test date. The Permittee shall submit a notice of the actual test date to the above address so that it is received at least two weeks prior to the test date.

(b) All test reports must be received by IDEM, OAQ and ERMD within forty-five (45) days after the completion of the testing. An extension may be granted by the IDEM, OAQ, and ERMD, if the source submits to IDEM, OAQ, a reasonable written explanation within five (5) days prior to the end of the initial forty-five (45) day period.

The documentation submitted by the Permittee does not require certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

Compliance Monitoring Requirements [326 IAC 2-7-5(1)] [326 IAC 2-7-6(1)]

C.8 Compliance Monitoring [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]

Compliance with applicable requirements shall be documented as required by this permit. The Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment. All monitoring and record keeping requirements not already legally required shall be implemented when operation begins.

C.9 Maintenance of Monitoring Equipment [326 IAC 2-7-5(3)(A)(iii)]

(a) In the event that a breakdown of the monitoring equipment occurs, a record shall be made of the times and reasons of the breakdown and efforts made to correct the problem. To the extent practicable, supplemental or intermittent monitoring of the parameter should be implemented at intervals no less frequent than required in Section D of this approval until such time as the monitoring equipment is back in operation.

(b) The Permittee shall install, calibrate, quality assure, maintain, and operate all necessary monitors and related equipment. In addition, prompt corrective action shall be initiated whenever indicated.

C.10 Pressure Gauge Specifications

Whenever a condition in this permit requires the measurement of pressure drop across any part of the unit or its control device, the gauge employed shall have a scale such that the expected normal

reading shall be no less than twenty percent (20%) of full scale and be accurate within plus or minus two percent (±2%) of full scale reading.

Corrective Actions and Response Steps [326 IAC 2-7-5] [326 IAC 2-7-6]

C.11 Compliance Monitoring Plan - Failure to Take Response Steps [326 IAC 2-7-5][326 IAC 2-7-6] [326 IAC 1-6]

(a) The Permittee is required to implement a compliance monitoring plan to ensure that reasonable information is available to evaluate its continuous compliance with applicable requirements. This compliance monitoring plan is comprised of:

(1) This condition;

(2) The Compliance Determination Requirements in Section D of this approval;

(3) The Compliance Monitoring Requirements in Section D of this approval;

(4) The Record Keeping and Reporting Requirements in Section C (Monitoring Data Availability, General Record Keeping Requirements, and General Reporting Requirements) and in Section D of this approval; and

(5) A Compliance Response Plan (CRP) for each compliance monitoring condition of this approval. CRP's shall be submitted to IDEM, OAQ, and ERMD upon request and shall be subject to review and approval by IDEM, OAQ, and ERMD. The CRP shall be prepared within ninety (90) days after issuance of this approval by the Permittee and maintained on site, and is comprised of :

(A) Response steps that will be implemented in the event that compliance related information indicates that a response step is needed pursuant to the requirements of Section D of this approval; and

(B) A time schedule for taking such response steps including a schedule for devising additional response steps for situations that may not have been predicted.

(b) For each compliance monitoring condition of this approval, appropriate response steps shall be taken when indicated by the provisions of that compliance monitoring condition. Failure to perform the actions detailed in the compliance monitoring conditions or failure to take the response steps within the time prescribed in the Compliance Response Plan, shall constitute a violation of the approval unless taking the response steps set forth in the Compliance Response Plan would be unreasonable.

(c) After investigating the reason for the excursion, the Permittee is excused from taking further response steps for any of the following reasons:

(1) The monitoring equipment malfunctioned, giving a false reading. This shall be an excuse from taking further response steps providing that prompt action was taken to correct the monitoring equipment.

(2) The Permittee has determined that the compliance monitoring parameters established in the approval conditions are technically inappropriate, has previously submitted a request for an administrative amendment to the approval, and such request has not been denied or;

(3) An automatic measurement was taken when the process was not operating; or

(4) The process has already returned to operating within "normal" parameters and no response steps are required.

(d) Records shall be kept of all instances in which the compliance related information was not met and of all response steps taken. In the event of an emergency, the provisions of 326 IAC 2-7-16 (Emergency Provisions) requiring prompt corrective action to mitigate emissions shall prevail.

C.12 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-7-5] [326 IAC 2-7-6]

(a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this approval exceed the level specified in any condition of this approval, the Permittee shall take appropriate corrective actions. The Permittee shall submit a description of these corrective actions to IDEM, OAQ, within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize emissions from the affected facility while the corrective actions are being implemented. IDEM, OAQ shall notify the Permittee within thirty (30) days, if the corrective actions taken are deficient. The Permittee shall submit a description of additional corrective actions taken to IDEM, OAQ within thirty (30) days of receipt of the notice of deficiency. IDEM, OAQ reserves the authority to use enforcement activities to resolve noncompliant stack tests.

(b) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Should the Permittee demonstrate to IDEM, OAQ that retesting in one-hundred and twenty (120) days is not practicable, IDEM, OAQ may extend the retesting deadline. Failure of the second test to demonstrate compliance with the appropriate approval conditions may be grounds for immediate revocation of the approval to operate the affected facility.

The documents submitted pursuant to this condition do not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

C.13 Monitoring Data Availability [326 IAC 2-7-6(1)] [326 IAC 2-7-5(3)]

(a) With the exception of performance tests conducted in accordance with Section C-Performance Testing, all observations, sampling, maintenance procedures, and record keeping, required as a condition of this approval shall be performed at all times the equipment is operating at normal representative conditions.

(b) As an alternative to the observations, sampling, maintenance procedures, and record keeping of subsection (a) above, when the equipment listed in Section D of this approval is not operating, the Permittee shall either record the fact that the equipment is shut down or perform the observations, sampling, maintenance procedures, and record keeping that would otherwise be required by this approval.

(c) If the equipment is operating but abnormal conditions prevail, additional observations and sampling should be taken with a record made of the nature of the abnormality.

(d) If for reasons beyond its control, the operator fails to make required observations, sampling, maintenance procedures, or record keeping, reasons for this must be recorded.

(e) At its discretion, IDEM may excuse such failure providing adequate justification is documented and such failures do not exceed five percent (5%) of the operating time in any quarter.

(f) Temporary, unscheduled unavailability of staff qualified to perform the required observations, sampling, maintenance procedures, or record keeping shall be considered a valid reason for failure to perform the requirements stated in (a) above.

C.14 General Record Keeping Requirements [326 IAC 2-7-5(3)][326 IAC 2-7-6]

(a) Records of all required monitoring data and support information shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be kept at the source location for a minimum of three (3) years and available upon the request of an IDEM, OAQ, and ERMD representative. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner or ERMD make a written request for records to the Permittee, the Permittee shall furnish the records to the Commissioner or ERMD within a reasonable time.

(b) Records of required monitoring information shall include, where applicable:

(1) The date, place, and time of sampling or measurements;

(2) The dates analyses were performed;

(3) The company or entity performing the analyses;

(4) The analytic techniques or methods used;

(5) The results of such analyses; and

(6) The operating conditions existing at the time of sampling or measurement.

(c) Support information shall include, where applicable:

(1) Copies of all reports required by this approval;

(2) All original strip chart recordings for continuous monitoring instrumentation;

(3) All calibration and maintenance records;

(4) Records of preventive maintenance shall be sufficient to demonstrate that failure to implement the Preventive Maintenance Plan did not cause or contribute to a violation of any limitation on emissions or potential to emit. To be relied upon subsequent to any such violation, these records may include, but are not limited to: work orders, parts inventories, and operator's standard operating procedures. Records of response steps taken shall indicate whether the response steps were performed in accordance with the Compliance Response Plan required by Section C - Compliance Monitoring Plan - Failure to take Response Steps, of this approval, and whether a deviation from an approval condition was reported. All records shall briefly describe what maintenance and response steps were taken and indicate who performed the tasks.

(d) All record keeping requirements not already legally required shall be implemented within ninety (90) days of approval issuance.

C.15 General Reporting Requirements [326 IAC 2-7-5(3)(C)]

(a) The reports required by conditions in Section D of this approval shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

and

ERMD
2700 South Belmont Avenue
Indianapolis, IN 46221

(b) Unless otherwise specified in this approval, any notice, report, or other submission required by this approval shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, and ERMD on or before the date it is due.

(c) Unless otherwise specified in this approval, any quarterly report shall be submitted within thirty (30) days of the end of the reporting period. The report does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(d) The first report shall cover the period commencing on the date of issuance of this approval and ending on the last day of the reporting period.

SECTION D FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]: Three (3) new shaker units identified as Emission Unit ID 44 with combined maximum capacity of 75 tons of castings per hour and controlled by an existing baghouse identified as Control Equipment ID CE-8, exhausting at 60,000 acfm at Stack/Vent ID S-8, and by an additional new baghouse identified as Control Equipment ID CE-7, exhausting at 120,000 acfm at Stack/Vent ID S-7.
(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.1 Particulate Matter (PM) [326 IAC 6-1-2 (Particulate Limitations: specified)]

Pursuant to 326 IAC 6-1-2 (a), PM emission from these three(3) shaker units Emission Unit ID 44, controlled by baghouses identified as Control Equipment ID CE-7 and CE-8, shall be less than 0.03 grain per dry standard cubic foot (gr/dscf).

D.2 PSD Minor Modification Limit [326 IAC 2-2] [40 CFR 52.21]

(a) This facility shall process no more than 400,000 tons of metal per 12 consecutive month period. This production limit is required to limit the potential to emit of PM10/PM to less than 15 tons per twelve (12) consecutive month period. Compliance with this limit makes 326 IAC 2-2 (Prevention of Significant Deterioration) not applicable.

(b) The PM10/PM emission from the three (3) shaker units EU ID 44 after control shall not exceed 0.075 pounds per ton of metal processed, which, combined with the metal processing limit, is equivalent to less than 15 tons per year.

D.3 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for this facility and any control devices.

Compliance Determination Requirements

D.4. Performance Testing [326 IAC 3-6][326 IAC 2-1.1-11]

(a) Compliance with Conditions D.1 and D.2 shall be determined by conducting a stack test for PM and PM10 in accordance with Condition C.7 of this Modification.

(b) Compliance stack tests shall be performed for Particulate Matter (PM and PM10) on the baghouses identified as Control Equipment ID CE-7 and CE-8 in accordance with Condition C.7 of this Modification.

(c) Whenever the results of the stack tests performed exceed the level specified in this permit, appropriate corrective actions shall be implemented within thirty (30) days of receipt of the test results. These actions shall be implemented within the thirty (30) day time period unless otherwise notified by OAQ and ERMD of another agreed upon time frame. The Permittee shall minimize emissions while the corrective actions are being implemented.

(d) A second test to demonstrate compliance shall be performed within 120 days of the completed corrective action. Failure of the second test to demonstrate compliance may be grounds for immediate revocation of this permit to operate the affected facility.

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

D.5 Particulate Matter (PM)

(a) In order to comply with condition D.2, the baghouses for PM control, identified as Control Equipment ID CE-7 and CE-8, shall be in operation and control emissions from the Emission Unit ID 44 at all times when the three(3) shaker units Emission Unit ID 44 are in operation.

(b) The Permittee shall record the total static pressure drop across the baghouses identified as Control Equipment ID CE-7 and CE-8 controlling the three (3) shaker units Emission Unit ID 44, at least once per shift when the three (3) shaker units Emission Unit ID 44 are in operation. Unless operated under conditions for which the Preventive Maintenance Plan specifies otherwise, the pressure drop across the baghouse shall be maintained within the range of 3.0 to 6.0 inches of water or a range established during the latest stack test. The Preventive Maintenance Plan for this unit shall contain troubleshooting contingency and corrective actions for when the pressure reading is outside of the above mentioned range for any one reading.

(c) The instrument used for determining the pressure shall comply with Condition C.10 - Pressure Gauge Specifications, of this permit, shall be subject to approval by IDEM, OAQ, and ERMD and shall be calibrated at least once every six (6) months.

D.6 Baghouse Inspections

An inspection shall be performed each calender quarter of all bags controlling the shakers operation when venting to the atmosphere. A baghouse inspection shall be performed within three months of redirecting vents to the atmosphere and every three months thereafter. All defective bags shall be replaced.

D.7 Broken or Failed Bag Detection

In the event that bag failure has been observed:

(a) For multi-compartment units, the affected compartments will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if there are no visible emissions or if the event qualifies as an emergency and the Permittee satisfies the emergency provisions of this permit (Section B- Emergency Provisions). Within eight (8) business hours of the determination of failure, response steps according to the timetable described in the Compliance Response Plan shall be initiated. For any failure with corresponding response steps and timetable not described in the Compliance Response Plan, response steps shall be devised within eight (8) business hours of discovery of the failure and shall include a timetable for completion. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.

(b) For single compartment baghouses, failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

D.8 Visible Emissions Notations

(a) Visible emission notations of baghouses identified as Control Equipment ID CE-7 and ID CE-8, controlling the three(3) shaker units Emission Unit ID 44, stack exhausts shall be performed once per shift during normal daylight operations. A trained employee shall record whether emissions are normal or abnormal.

(b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.

(c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.

(d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.

(e) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.

Record Keeping and Reporting Requirement [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.9 Record Keeping Requirements

(a) To document compliance with Condition D.2, the Permittee shall maintain records in accordance with (1) and (2) below. Records maintained for (1) and (2) shall be taken monthly and shall be complete and sufficient to establish compliance with the PM/PM10 emission limit established in Condition D.2.

(1) Calendar dates covered in the compliance determination period;

(2) Actual amount (in tons) of metal processed in three (3) shaker units EU ID 44;

(a) To document compliance with Condition D.7, the Permittee shall maintain records of visible emission notations of the baghouses identified as Control Equipment ID CE-7 and CE-8.

(c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.10 Reporting Requirements

(a) A quarterly summary of the information to document compliance with Condition D.2 shall be submitted to the addresses listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter period being reported. The report submitted by the Permittee does require the certification by the “responsible official” as defined by 326 IAC 2-7-1(34).

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION

INDIANAPOLIS ENVIRONMENTAL RESOURCES MANAGEMENT DIVISION

PART 70 SOURCE MODIFICATION CERTIFICATION

Source Name: Daimler Chrysler Indianapolis Foundry
Source Address: 1100 South Tibbs Avenue, Indianapolis, IN 46241
Mailing Address: 1100 South Tibbs Avenue, Indianapolis, IN 46241
Source Modification No.: 097-12464-00012

This certification shall be included when submitting monitoring, testing reports/results or other documents as required by this approval.

Please check what document is being certified:

9 Test Result (specify) _____

9 Report (specify) _____

9 Notification (specify) _____

9 Other (specify) _____

I certify that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

Signature:

Printed Name:

Title/Position:

Date:

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION

INDIANAPOLIS ENVIRONMENTAL RESOURCES MANAGEMENT DIVISION

Part 70 Source Modification Quarterly Report

Source Name: Daimler Chrysler Indianapolis Foundry
Source Address: 1100 South Tibbs Avenue, Indianapolis, IN 46241
Mailing Address: 1100 South Tibbs Avenue, Indianapolis, IN 46241
Source Modification No.: 097-12464-00012
Facility: Three (3) new shaker units identified as Emission Unit ID 44
Parameter: Tons of metal processed; Particulate (PM/PM10) emissions
Limit: 400,000 ton/yr of metall processed; 14.98 ton/yr

YEAR: _____

Month	Column 1	Column 2	Column 1 + Column 2
	This Month	Previous 11 Months	12 Month Total
Month 1			
Month 2			
Month 3			

9 No deviation occurred in this quarter.

9 Deviation/s occurred in this quarter.
Deviation has been reported on: _____

Submitted by: _____
Title / Position: _____
Signature: _____
Date: _____
Phone: _____

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION

INDIANAPOLIS ENVIRONMENTAL RESOURCES MANAGEMENT DIVISION

QUARTERLY DEVIATION and COMPLIANCE MONITORING REPORT

Source Name: Daimler Chrysler Indianapolis Foundry
Source Address: 1100 South Tibbs Avenue, Indianapolis, IN 46241
Mailing Address: 1100 South Tibbs Avenue, Indianapolis, IN 46241
Source Modification No.: 097-12464-00012
Facility: Three (3) new shaker units identified as Emission Unit ID 44
Part 70 Permit No.: T097-6485-00012

Months: _____ to _____ Year: _____

This report is an affirmation that the source has met all the requirements stated in this permit. This report shall be submitted quarterly based on a calendar year. Any deviation from the requirements, the date(s) of each deviation, the probable cause of the deviation, and the response steps taken must be reported. Deviations that are required to be reported by an applicable requirement shall be reported according to the schedule stated in the applicable requirement and do not need to be included in this report. Additional pages may be attached if necessary. If no deviations occurred, please specify in the box marked "No deviations occurred this reporting period".

9 NO DEVIATIONS OCCURRED THIS REPORTING PERIOD.

9 THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD

Permit Requirement (specify permit condition #)	
Date of Deviation:	**Duration of Deviation:**
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	

Permit Requirement (specify permit condition #)	
Date of Deviation:	**Duration of Deviation:**
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	

Permit Requirement (specify permit condition #)	
Date of Deviation:	**Duration of Deviation:**
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	
Permit Requirement (specify permit condition #)	
Date of Deviation:	**Duration of Deviation:**
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	
Permit Requirement (specify permit condition #)	
Date of Deviation:	**Duration of Deviation:**
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	

Form Completed By: ______________________________

Title/Position: ______________________________

Date: ______________________________

Phone: ______________________________

Attach a signed certification to complete this report.

Mail to: Environmental Resources Management Division
Air Quality Quality Section
2700 South Belmont Avenue
Indianapolis, Indiana 46221-2097

Daimler Chrysler Indianapolis Foundry
1100 South Tibbs Avenue,
Indianapolis, Indiana 46241-2797

Affidavit of Construction

I, _____, being duly sworn upon my oath, depose and say:
(Name of the Authorized Representative)

1. I live in _____ County, Indiana and being of sound mind and over twenty-one (21) years of age, I am competent to give this affidavit.
2. I hold the position of _____ for _____.
(Title) (Company Name)
3. By virtue of my position with _____, I have personal knowledge of the representations contained in this affidavit and am authorized to make these representations on behalf of _____ .
(Company Name)
4. I hereby certify that Daimler Chrysler Indianapolis Foundry, 1100 South Tibbs Avenue, Indianapolis, Indiana, 46241-2797, has constructed the three (3) new shaker units identified as Emission Unit ID 44, and an additional new baghouse identified as Control Equipment ID CE-7, exhausting at Stack/Vent ID S-7, in conformity with the requirements and intent of the Significant Source Modification application received by the Environmental Resources Management Division on **July 10, 2000** and as permitted pursuant to **Significant Source Modification No. 097-12464-00012, Plant ID No. 09700012,** issued on _____ .

Further Affiant said not.

I affirm under penalties of perjury that the representations contained in this affidavit are true, to the best of my information and belief.

_____
Signature

_____
Date

STATE OF INDIANA)
)SS
COUNTY OF _____)

Subscribed and sworn to me, a notary public in and for _____ County and State of Indiana on this _____ day of _____, 200 _____ .

My Commission expires: _____

_____
Signature

_____
Name (typed or printed)

Indiana Department of Environmental Management
Office of Air Management

Addendum to the
Technical Support Document for Part 70 Significant Source Modification

Source Name:	**DaimlerChrysler Indianapolis Foundry**
Source Location:	**1100 South Tibbs Avenue, Indianapolis, IN 46241**
County:	**Marion**
SIC Code:	**3321**
Source Modification No.:	**097-12464-00012**
Part 70 Permit No.:	**T097-6485-00012**
Permit Reviewer:	**Boris Gorlin**

On February 9, 2001, the Indianapolis Environmental Resources Management Division (ERMD) had a notice published in the Indianapolis Star, Indiana, stating that **DaimlerChrysler Indianapolis Foundry** had applied for a Significant Part 70 Permit Modification relating to the operation of three (3) new shaker units identified as Emission Unit ID 44 with combined maximum capacity of 75 tons of castings per hour and controlled by an existing baghouse identified as Control Equipment ID CE-8, exhausting at 60,000 acfm at Stack/Vent ID S-8, and by an additional new baghouse identified as Control Equipment ID CE-7, exhausting at 120,000 acfm at Stack/Vent ID S-7.

The notice also stated that ERMD proposed to issue a permit for this construction and operation and provided information on how the public could review the proposed permit and other documentation. Finally, the notice informed interested parties that there was a period of thirty (30) days to provide comments on whether or not this permit should be issued as proposed.

On February 6, 2001, IDEM, OAQ (David Cline) submitted a comment on the proposed Significant Part 70 Permit Modification.

Comment 1:

> It may be difficult to perform the testing that is required in condition D.4. Since the shakers units exhaust to two different baghouses we may have a problem testing the emissions which exhaust to the existing baghouse. I am assuming that the existing baghouse also has a limit of 0.03 gr/dscf. We could test both baghouses to determine if they are at or below 0.03 gr/dscf, however you would not be able to determine what percentage of the emissions at the existing baghouse came from the new shaker units. Additionally, D.2 (b) requires compliance with a 0.075 lb/ton of metal limit. Since the existing baghouse already has other emissions units ducted to it (I am assuming it is in use) we could not differentiate the emissions from the shakers and therefore could not determine compliance with D.2 (b). Please keep in mind that in order to maximize the loading to the common baghouse, we would need to have the other emissions units in operation at the same time the new shakers were tested. It would not be possible to limply run the shakers since the baghouse performance could well be different with the additional airflow and emissions that the other processes could generate.

Response to Comment 1:

> The three new Shakers are vented to the existing 60,000 acfm and new 120, 000 acfm baghouses through an individual collector. Additionally, the emissions from the existing 401 Shakeout and new Shakers are channeled through different compartments of the new 120,000 acfm baghouse. Therefore, testing both baghouses at the same time, including the new Shakers collector, will allow

to check compliance with the limits required by Condition D.2 (b). The stack testing protocol will be submitted to the ERMD and IDEM no later than thirty-five (35) days prior to the intended test date (Condition C.7) and will be scrutinized for appropriate testing technique.

No change in the permit was made as a result of this comment.

On March 6, 2001, the source submitted comments on the proposed Significant Part 70 Permit Modification. The summary of the comments is as follows:

Comment 2:

The Condition **C6 Stack Height** addresses the stack height that can be accounted for in dispersion modeling demonstrations. Therefore, DaimlerChrysler does not believe that it is the intention of this requirement to require ambient air quality modeling and requests that the condition be modified as follows: "The Permittee shall comply with the applicable provisions of 326 IAC 1-7 (Stack Height Provisions), for all exhaust stacks through which a potential (before controls) of twenty-five (25) tons per year or more of particulate matter or sulfur dioxide is emitted~~ by using ambient air quality modeling pursuant to 326 IAC 1-7-4~~."

Response to Comment 1:

The Condition C.6 was modified as follows:

C.6 Stack Height [326 IAC 1-7]

The Permittee shall comply with the applicable provisions of 326 IAC 1-7 (Stack Height Provisions), for all exhaust stacks through which a potential (before controls) of twenty-five (25) tons per year or more of particulate matter or sulfur dioxide is emitted.~~ by using ambient air quality modeling pursuant to 326 IAC 1-7-4.~~

Comment 3:

There is a typo in Condition D.8 – Visible Emissions Notations. Reference to "combusting fuel oil" must be deleted.

Response to Comment 3:

D.8 Visible Emissions Notations

(a) Visible emission notations of baghouses identified as Control Equipment ID CE-7 and ID CE-8, controlling the three(3) shaker units Emission Unit ID 44, stack exhausts shall be performed once per shift during normal daylight operations ~~while combusting fuel oil~~. A trained employee shall record whether emissions are normal or abnormal.

Comment 4:

Subsequent to the original application submittal, there has been a new Plant Manager assigned at the IFP. The new Plant Manager is Robert L. Bowers. All documents referencing the Plant Manager, should reflect the new Plant Manager.

Response to Comment 4:

Condition A.1 was modified as follows:

A.1 General Information [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)] [326 IAC 2-7-1(22)]

The Permittee owns and operates stationary grey iron foundry.

Responsible Official:	**Robert L. Bowers,** ~~Kenneth Beisinger,~~ Plant ~~Production~~ Manager
Source Address:	1100 South Tibbs Avenue, Indianapolis, IN 46241
Mailing Address:	1100 South Tibbs Avenue, Indianapolis, IN 46241
Phone Number:	(317) 240-4957
SIC Code:	3321
County Location:	Marion
County Status:	Attainment for all criteria pollutants
Source Status:	Part 70 Permit Program. PSD major source

Indiana Department of Environmental Management
Office of Air Management
and
Indianapolis Environmental Resources Management Division

Technical Support Document (TSD) for a Part 70 Significant Source Modification

Source Background and Description

Source Name:	**Daimler Chrysler Indianapolis Foundry**
Source Location:	**1100 South Tibbs Avenue, Indianapolis, IN 46241**
County:	**Marion**
SIC Code:	**3321**
Source Modification No.:	**097-12464-00012**
Permit Reviewer:	**Boris Gorlin**

The Environmental Resources Management Division (ERMD) has reviewed an application from Daimler Chrysler Indianapolis Foundry Significant Source Modification application relating to the operation of three (3) new shaker units identified as Emission Unit ID 44 with combined maximum capacity of 75 tons of castings per hour and controlled by an existing baghouse identified as Control Equipment ID CE-8, exhausting at 60,000 acfm at Stack/Vent ID S-8, and by an additional new baghouse identified as Control Equipment ID CE-7, exhausting at 120,000 acfm at Stack/Vent ID S-7.

History

On July 13, 2000, Daimler Chrysler Indianapolis Foundry submitted an Interim Significant Permit Modification Petition to the ERMD requesting to add additional three (3) new shaker units identified as Emission Unit ID 44 to their existing plant. The Interim Significant Permit Modification I-097-12464-00012 was issued on August 23, 2000 and expires on the effective date of the final Significant Source Modification.

Existing Approvals

The source applied for a Part 70 Operating Permit T097-6485-00012 on August 29, 1996. The source has been operating under previous approvals including, but not limited to, the following:

(a) CP-0970012-03 (Core Room), issued in 1997;

(b) CP 0970012-04 (Cupola Melt System), issued in 1997, and

(c) CP-0980012-01 (Cleaning Department), issued in 1998.

Enforcement Issue

The source has the following enforcement action pending:

(a) Notice of Violation (NOV)) issued to the company for opacity violations from the CKO BACT scrubber stack. The cause of the opacity problem was the lack of water in the scrubber. The action is close to resolution.

No other enforcement actions are pending.

Stack Summary

Stack ID	Operation	Height (feet)	Diameter (inches)	Flow Rate (acfm)	Temperature (^{0}F)
S-7 (CE-7, new)	3 new Shaker units, 401 Shakeout	80	64	120,000	120
S-8 (CE-8, existing)	3 new Shaker units	80	40	60,000	120

Recommendation

The staff recommends to the Commissioner that the Significant Source Modification be approved. This recommendation is based on the following facts and conditions:

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant.

An application for the purposes of this review was received on July 10, 2000. Additional information was received on December 8, 2000.

Emission Calculations

The calculations submitted by the applicant have been verified and found to be accurate and correct. These calculations are provided in Appendix A of this document (one page).

Potential To Emit of Modification

Pursuant to 326 IAC 2-1.1-1(16), Potential to Emit is defined as "the maximum capacity of a stationary source to emit any air pollutant under its physical and operational design. Any physical or operational limitation on the capacity of a source to emit an air pollutant, including air pollution control equipment and restrictions on hours of operation or type or amount of material combusted, stored, or processed shall be treated as part of its design if the limitation is enforceable by the U. S. EPA."

Pollutant	Potential To Emit (tons/year) (Uncontrolled)
PM	1,051.2
PM-10	735.8
SO_2	0
VOC	0
CO	0
NO_x	0

Justification for Modification

The Part 70 Operating permit application is being modified through a Part 70 Significant Source Modification pursuant to 326 IAC 2-7-10.5(f)(4) and (g), because its potential to emit PM/PM10 is greater than 25 tons per year.

This approval authorizes the source to construct and operate, subject to the conditions contained in this Significant Source Modification, the emission units described in Section A (Source Summary) of this permit.

County Attainment Status

The source is located in Marion County.

Pollutant	Status
PM-10	Attainment
SO_2	Maintenance
NO_2	Attainment
Ozone	Maintenance
CO	Attainment
Lead	Attainment

(a) Volatile organic compounds (VOC) and oxides of nitrogen (NOx) are precursors for the formation of ozone. Therefore, VOC and NO_X emissions are considered when evaluating the rule applicability relating to the ozone standards. Marion County has been designated as attainment or unclassifiable for ozone. Therefore, VOC and NOx emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 and 40 CFR 52.21.

(b) Marion County has been classified as attainment or unclassifiable for all the criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 and 40 CFR 52.21.

Source Status

Existing Source PSD or Emission Offset Definition (emissions after controls, based upon 8760 hours of operation per year at rated capacity and/or as otherwise limited):

Pollutant	Emissions (tons/year)
PM	Greater than 100
PM-10	Greater than 100
SO_2	Greater than 100
VOC	Greater than 100
CO	Greater than 100
NOx	Greater than 100

(b) According to 326 IAC 2-2-1(p)(1)(F), this existing source is a major stationary source because an attainment regulated pollutant is emitted at a rate of 100 tons per year or more, and it is one of the 28 listed source categories as an iron mill plant.

(d) These emissions are based upon the source's 1999 annual emission statement.

Limited Potential to Emit

The table below summarizes the Modification potential to emit, reflecting all limits, of the significant emission units after controls. The control equipment is considered federally enforceable only after issuance of this Part 70 source modification.

The source requested, for the purpose of this permit, to treat the PM emissions as PM10 and agreed

to take more stringent, conservative limits for PM emissions, identical to those required for PM10.

	Potential to Emit, (tons/year)					
Process/facility	PM	PM-10	SO_2	VOC	CO	NOx
Three (3) new shaker units EU 44	14.98	14.98	0	0	0	0
PSD or Offset Significant Levels	25	15	40	40	100	40

This modification to an existing major stationary source is not major because the emissions increase is less than the PSD significant levels. Therefore, pursuant to 326 IAC 2-2, and 40 CFR 52.21, the PSD requirements do not apply.

Federal Rule Applicability

There are no New Source Performance Standards (NSPS)(326 IAC 12 and 40 CFR Part 60) applicable to this proposed modification.

State Rule Applicability - Entire Source

326 IAC 2-6 (Emission Reporting)

This source is subject to 326 IAC 2-6 (Emission Reporting), because it has the potential to emit more than one hundred (100) tons per year of PM10. Pursuant to this rule, the owner/operator of the source must annually submit an emission statement for the source. The annual statement must be received by April 15 of each year and contain the minimum requirement as specified in 326 IAC 2-6-4. The submittal should cover the period defined in 326 IAC 2-6-2(8)(Emission Statement Operating Year).

326 IAC 5-1 (Visible Emissions Limitations)

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Exemptions), opacity shall meet the following, unless otherwise stated in this permit:

(a) Opacity shall not exceed an average of thirty percent (30%) any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.

(b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings) as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

State Rule Applicability - Individual Facilities

326 IAC 6-1-2 (Particulate Limitations: specified)

(a) Potential to emit of the proposed modification before control is more than 100 tons per year. Therefore, this rule is applicable. Pursuant to 326 IAC 6-1-2 (a), emission from these three(3) shaker units Emission Unit ID 44 shall be less than 0.03 grain per dry standard cubic foot (dscf). By the manufacturer's specifications, the baghouses identified as Control Equipment ID CE-7 and ID CE-8 exhaust will contain no more than 0.006 dscf, which will have to be verified during the required Performance Stack Test; therefore, this source will be in compliance with this rule.

(b) This facility shall process no more than 400,000 tons of metal per 12 consecutive month period. This production limit is required to limit the potential to emit of PM10/PM to less than 15 tons per twelve (12) consecutive month period. Compliance with this limit makes 326 IAC 2-2 (Prevention of Significant Deterioration) not applicable.

(e) The PM10/PM emission from the three (3) shaker units EU ID 44 after control shall not exceed 0.075 pounds per ton of metal processed, which, combined with the metal processing limit, is equivalent to less than 15 tons per year.

(c) The baghouses identified as Control Equipment ID CE-7 and ID CE-8 shall be in operation at all times when the three(3) shaker units Emission Unit ID 44 are in operation, in order to comply with this limit.

326 IAC 2-2 (Prevention of Significant Deterioration)

The three (3) shaker units Emission Unit ID 44 PM10 (PM) emission after control shall be limited to 5.62 lb/hr, which is equivalent to the sourcewide metal melted and processed limit of 400,000 tons per 12 consecutive month period or PM10(PM) emission of 14.98 tons per 12 consecutive month period. Therefore, this modification is not a major PSD modification, because the limited emission increase is less than significant level, and the PSD rule 326 IAC 2-2 is not applicable.

Compliance Requirements

Permits issued under 326 IAC 2-7 are required to ensure that sources can demonstrate compliance with applicable state and federal rules on a more or less continuous basis. All state and federal rules contain compliance provisions, however, these provisions do not always fulfill the requirement for a more or less continuous demonstration. When this occurs, IDEM, OAQ, in conjunction with the source, must develop specific conditions to satisfy 326 IAC 2-7-5. As a result, compliance requirements are divided into two sections: Compliance Determination Requirements and Compliance Monitoring Requirements.

Compliance Determination Requirements in Section D of the permit are those conditions that are found more or less directly within state and federal rules and the violation of which serves as grounds for enforcement action. If these conditions are not sufficient to demonstrate continuous compliance, they will be supplemented with Compliance Monitoring Requirements, also Section D of the permit. Unlike Compliance Determination Requirements, failure to meet Compliance Monitoring conditions would serve as a trigger for corrective actions and not grounds for enforcement action. However, a violation in relation to a compliance monitoring condition will arise through a source's failure to take the appropriate corrective actions within a specific time period.

The compliance monitoring requirements applicable to this modification are as follows:

1. The three(3) shaker units Emission Unit ID 44 has applicable compliance monitoring conditions as specified below:

   (a) Daily visible emissions notations of the baghouses CE-7 and CE-8 stack exhausts ID S-7 and S-8 shall be performed during normal daylight operations. A trained employee will record whether emissions are normal or abnormal. For processes operated continuously "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time. In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions. A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process. The Preventive Maintenance Plan for this unit shall contain

troubleshooting contingency and corrective actions for when an abnormal emission is observed.

(b) The Permittee shall record the total static pressure drop across the baghouse controlling the three(3) shaker units Emission Unit ID 44, at least once per shift when the three(3) shaker units Emission Unit ID 44 are in operation. Unless operated under conditions for which the Preventive Maintenance Plan specifies otherwise, the pressure drop across the baghouse shall be maintained within the range of 3.0 to 6.0 inches of water or a range established during the latest stack test. The Preventive Maintenance Plan for this unit shall contain troubleshooting contingency and corrective actions for when the pressure reading is outside of the above mentioned range for any one reading.

These monitoring conditions are necessary because the baghouses for the shaker units Emission Unit ID 44 must operate properly to ensure compliance with 326 IAC 6-1-2 (Particulate Limitations: Specified) and 326 IAC 2-7 (Part 70).

Air Toxic Emissions

Indiana presently requests applicants to provide information on emissions of the 188 hazardous air pollutants (HAPs) set out in the Clean Air Act Amendments of 1990. These pollutants are either carcinogenic or otherwise considered toxic and are commonly used by industries. They are listed as air toxics on the Part 70 Application Form GSD-08.

None of the listed air toxics will be emitted from this source.

Conclusion

The operation of these three (3) new shaker units Emission Unit ID 44 shall be subject to the conditions of the attached proposed Significant Source Modification 097-12464-00012.

DAIMLER CHRYSLER INDIANAPOLIS FOUNDRY
Significant Source Modification 097-12464-00012

Date:	(revised)	01/09/2002	**REVISED EMISSION CALCULATION**	KERAMIDA ENVIRONMENTAL, INC.
Calculated By:		R.M.E.H.	**UNCONTROLLED AND CONTROLLED**	330 North College Avenue
Checked By:		E.R.H.	**PM AND PM10 EMISSIONS**	Indianapolis, Indiana 46202
				(317) 685-6600 - FAX (317) 685-6610

Uncontrolled Emissions Calculations for Sources:	SCC Code	Control Mech.	Rated Capacity ton/hr	Units	Operating Hours (Hrs/Day)	Operating Hours (Days/Yr)	Grain Loading (gr/SCF)	Stack Gas Flow Rate (ACFM)	Stack Gas Temp. (deg F)	Stack Gas Flow Rate (SCFM)	**PM10 Emission Factor** #	Units	Source	POTENTIAL PM10 UNCONTROLLED EMISSIONS (lbs/hr)	(lbs/day)	(tons/yr)
3 Shakers	none	Baghouse	75	TM/Hr	24	365		120,000	120	109,241	2.24	lbs/TM	Meth 1	168.00	4032.00	735.84
												TOTALS		168.0	4032.0	735.8

Uncontrolled Emissions Calculations for Sources:	SCC Code	Control Mech.	Rated Capacity ton/hr	Units	Operating Hours (Hrs/Day)	Operating Hours (Days/Yr)	Grain Loading (gr/SCF)	Stack Gas Flow Rate (ACFM)	Stack Gas Temp. (deg F)	Stack Gas Flow Rate (SCFM)	**PM Emission Factor** #	Units	Source	POTENTIAL PM UNCONTROLLED EMISSIONS (lbs/hr)	(lbs/day)	(tons/yr)
3 Shakers	none	Baghouse	75	TM/Hr	24	365		120,000	120	109,241	3.20	lbs/TM	Meth 1	240.00	5760.00	1051.20
												TOTALS		240.0	5760.0	1051.2

Controlled Emissions Calculations for Sources:	SCC Code	Control Mech.	Rated Capacity ton/hr	Units	Operating Hours (Hrs/Day)	Operating Hours (Days/Yr)	Control Efficiency %	Stack Gas Flow Rate (ACFM)	Stack Gas Temp. (deg F)	Stack Gas Flow Rate (SCFM)	**PM10 Emission Factor** #	Units	Source	POTENTIAL TO EMIT PM10 CONTROLLED EMISSIONS (lbs/hr)	(lbs/day)	(tons/yr)
3 Shakers	none	Baghouse	75	TM/Hr	24		96.7%	120,000	120	109,241	2.24	lbs/TM	Meth 1	5.62	134.84	14.98
												TOTALS		5.62	134.8	15.0

Metal throughput limit: **400,000 tons per year** | **Equivalent throughput limit:** **60.88%** | gr/dscf: 0.00600

The Equivalent Throughput Limit value is equal to 400,000 Tons Metal per Year divided by [(75 Tons Metal/Hour)(8760 Hours/Year)], or **45.7** **ton/hr**

Controlled Emissions Calculations for Sources:	SCC Code	Control Mech.	Rated Capacity ton/hr	Units	Operating Hours (Hrs/Day)	Operating Hours (Days/Yr)	Control Efficiency %	Stack Gas Flow Rate (ACFM)	Stack Gas Temp. (deg F)	Stack Gas Flow Rate (SCFM)	**PM Emission Factor** #	Units	Source	POTENTIAL TO EMIT PM CONTROLLED EMISSIONS (lbs/hr)	(lbs/day)	(tons/yr)
3 Shakers	none	Baghouse	75	TM/Hr	24		97.7%	120,000	120	109,241	3.20	lbs/TM	Meth 1	5.62	134.84	14.98
												TOTALS		5.62	134.8	

Metal throughput limit: 400,000 tons per year | Equivalent throughput limit: 60.88% | gr/dscf: 0.00600 **Or:** **0.075** lb/ton **14.98**

The Equivalent Throughput Limit value is equal to 400,000 Tons Metal per Year divided by [(75 Tons Metal/Hour)(8760 Hours/Year)].

EMISSION CALCULATIONS:

SAMPLE CALCULATIONS

METHOD 1: Controlled hourly emissions (lbs/hr) based on emission factors and control efficiencies

$$\frac{\text{Tons Metal}}{\text{Hour}} \times \frac{\text{lb Pollutant}}{\text{Ton Metal}} \times (1 - \%\ \text{Control Efficiency}) = \frac{\text{Controlled Lbs Pollutant}}{\text{Hour}}$$

The control efficiency is back-calculated based on uncontrolled emissions (AP-42 emission factor) and controlled emissions (gr/dscf x scfm x lb/7000 gr x 60 min/hr).

SAMPLE CALCULATIONS

METHOD 2: Controlled annual emissions (tons/yr) based on a 400,000 tons metal per year throughput limitation.

$$\frac{\text{Controlled Lbs Pollutant}}{\text{Hour}} \times \frac{\text{8760 Hours}}{\text{2000 Lbs/Ton}} \times \frac{\text{400,000 Tons Metal per Year}}{\text{(75 Tons Metal/Hour)(8760 Hours/Year)}} = \frac{\text{Tons Pollutant}}{\text{Year}}$$